

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551-FDS

Hon. F. Dennis Saylor IV

**PLAINTIFF’S RESPONSE TO DEFENDANT’S STATEMENT OF
ADDITIONAL FACTS IN OPPOSITION TO MOTION FOR PARTIAL SUMMARY
JUDGMENT OF NO INVALIDITY UNDER 35 U.S.C. § 101**

Plaintiff, Singular Computing LLC (“Singular”), submits the following responses to the statement of additional facts by defendant, Google LLC, in opposition to Singular’s motion for partial summary judgment of no invalidity under 35 U.S.C. § 101:

Statement of Fact	Response
7.	Not disputed.
8.	Disputed. <i>See, e.g.</i> , ’273 patent, Figs. 1-6 and cols. 7-29; ’156 patent Figs. 1-6 and cols. 6-29.
9.	Singular does not dispute that the specification includes the quoted language. Singular disputes that the specification uses the term “anything” in this context.
10.	Singular does not dispute that the specification includes the quoted language. Otherwise disputed. For example, the asserted claims include “at least X=5%,” “at least Y-0.05%” and a dynamic range of “1/1,000,000 through 1,000,000.”
11.	Singular does not dispute that the specification includes the quoted language. Singular disputes that the specification “goes out of its way” (whatever that is intended to mean) to assert that “analog and mixed signal embodiments” are “merely examples” and not limitations.

Dated: May 30, 2023

Respectfully submitted,

/s/ Kevin Gannon

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ATTORNEYS FOR THE PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system.

/s/ Kevin Gannon